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January 20, 2023

Hon. Loretta A. Preska
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. Keita, et al. (Jailyn Hilliard)
22-cr-435 (LAP)

Dear Judge Preska:

I am counsel for Jailyn Hilliard, one of the defendants in the above-captioned case pending before this Court. I submit this letter motion to request that the Court modify Mr. Hillard's curfew, one of her release conditions.

Ms. Hillard, who resides in Arkansas, was arraigned in this District on July xx, 2022. The government agreed to her release with several conditions: a \$25,000 PRB to be signed by two financially responsible persons; travel restricted to the SDNY/EDNY/ED Ark and points in between as needed for travel to court; surrender of travel documents and no new applications; pretrial supervision as directed by Pretrial Services; drug testing and treatment and mental-health evaluation and treatment; location monitoring technology as directed by Pretrial Services; no possession of narcotics or controlled substances without a prescription; no contact with victims or co-defendants outside the presence of counsel and maintain current residence unless given prior permission to move by Pretrial Services. Two other conditions are relevant to this application. Ms. Hilliard was required to "continue or seek employment", and she is subject to a "curfew." The hours of the curfew are not specified. Ms. Hilliard lost her job approximately one week ago. She has obtained new employment, the details of which are known to the government and to her Pretrial Services Officer in Arkansas. Ms. Hilliard has advised me that her new job requires her to report to work at 7:00 a.m. Currently, the curfew set by Pretrial in Arkansas (the curfew terms are not specified in the written bail conditions) requires her to be at home Monday through Friday from 9:30 p.m. to 7:00 a.m. I ask that the Court modify this condition to permit Ms. Hilliard to leave her home at 6:00 a.m. Monday through Friday. The other conditions of her release would remain the same.

SO ORDERED.



1/20/23

I have consulted with Jane Chong, who is representing the government in this case. The government has no objection to this request. Additionally, Ms. Hillard's Pretrial Service's Officer, Melvin Siebenmorgen, advised me that Pretrial Services in Arkansas does not object to the proposed modification.

Respectfully submitted,

_____/s/____

cc: AUSA Jane Chong (via ECF)
Pretrial Services Officer Melvin Siebenmorgen (via email)